



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 11, 2018

BY ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Kaloyeros, et al.*, 16 Cr. 776 (VEC)

Dear Judge Caproni:

The Government writes in response to the order issued by the Court on May 11, 2018 (Docket No. 647) regarding various deadlines for the June Trial. The Government writes on behalf of all parties. With respect to the use of a jury questionnaire at the June Trial, the Government does not request that such a questionnaire be used, while each defendant requests that a jury questionnaire be used. The Government will file a separate letter with the Court explaining its position in detail. With respect to the filing of motions to preclude expert witnesses, both the Government and defense counsel intend to file motions to preclude expert witnesses. The Government alone proposes the following briefing schedule:

May 23, 2018 – Deadline to submit any motions to preclude expert witnesses

May 30, 2018 – Deadline to file an opposition to any party's motion to preclude

June 6, 2018 or June 7, 2018 – Reserved for oral argument or a *Daubert* hearing, if necessary

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/
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cc: All parties (via ECF)